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Investment Partnership

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY CAMDEN VICINAGE

HEALEY ALTERNATIVE INVESTMENT PARTNERSHIP,

Plaintiff,

v.

ROYAL BANK OF CANADA, et al.,

Defendants.

Civil Action No.: 10-1567-RMB-KMW

[PROPOSED] ORDER

This Order confirms the directives given to counsel during the telephone conference held on **December 14, 2012**; and the Court noting the following appearances: Ernest E. Badway, Esq., and Kenneth H. Leichter, Esq., appearing on behalf of the plaintiff; William M. Regan, Esq., and Brian L. Muldrew, Esq., appearing on behalf of the defendants,

IT IS this 22 day of **December**, 2012, hereby **ORDERED**:

1. Defendants shall produce to Plaintiff the "core redemption files," as that phrase has been defined by the parties, for the hedge funds shown on the September 2008 "Basket

Report" attached as Exhibit B to Plaintiff's December 10, 2012 letter to the Court (the "Hedge Funds"), for the time period June 1, 2008 through March 23, 2012;

- 2. Defendants shall produce to Plaintiff all correspondence, including electronic mail correspondence and related attachments, between Defendants and the Hedge Funds for the time period March 23, 2011 through March 23, 2012;
- 3. Defendants shall submit a letter brief to the Court by December 28, 2012, describing the amount of data, the expected cost, and any other factors that Defendants contend bear on Defendants' ability to perform the searches and review of electronically stored information and documents that would be necessary to satisfy Plaintiff's discovery demands as described in Plaintiff's December 7, 2012 letter to the Court;
- 4. Plaintiff may submit a response to the letter contemplated in Paragraph 3 of this Order by January 9, 2013; and
 - 5. This Order is without prejudice to any additional relief sought by Plaintiff.

Dated: Januar 27, 20,72

KAREN M. WILLIAMS United States Magistrate Judge